

1
2
3
4
5
6
7
8
9 **IN THE UNITED STATES DISTRICT COURT**
10 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

11
12 People of the State of California, et al.

13 v.

14 Meta Platforms, Inc., Instagram, LLC, Meta
15 Payments, Inc., Meta Platforms Technologies,
16 LLC

17 IN RE: SOCIAL MEDIA ADOLESCENT
18 ADDICTION/PERSONAL INJURY PRODUCTS
19 LIABILITY LITIGATION

20 THIS DOCUMENT RELATES TO:

21 4:23-cv-05448.

MDL No. 3047

Case No.: 4:23-cv-05448-YGR

**STIPULATED REQUEST FOR AND
[PROPOSED] ORDER AUTHORIZING
META TO FILE AN AMENDED
ANSWER AND SETTING BRIEFING
SCHEDULE FOR STATE ATTORNEYS
GENERAL'S MOTION TO STRIKE**

Judge: Hon. Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

22 Under Civil Local Rules 6-2 and 7-12, the State Attorneys General ("State AGs") and Meta
23 Platforms, Inc.; Instagram, LLC; Meta Payments, Inc.; and Meta Platforms Technologies, LLC
24 (collectively, "Meta," and together, "Parties"), through their undersigned counsel, hereby stipulate as
25 follows:

26 1. On November 7, 2024, the Court approved the Parties' stipulation for an extension of
27 time to confer regarding Meta's filing of an amended answer and the State AGs' potential motion to
28

1 strike certain affirmative defenses pleaded by Meta. Dkt. No. 1311. On November 20, 2024, the Court
2 further approved the Parties' agreement to submit by no later than December 13, 2024, proposed
3 deadlines for the filing of Meta's amended answer and the State AGs' motion to strike. Case No. 23-
4 05448, Dkt. No. 142.

5 2. The Parties have met and conferred and agreed to the following schedule:

- 6 • Meta will file its amended answer by January 15, 2025;
- 7 • The State AGs will file any motion to strike by February 3, 2025;
- 8 • Meta will file any opposition by February 28, 2025; and
- 9 • The State AGs will file any reply by March 7, 2025.

10 3. The Parties further agree to have any motion to strike heard at the March 21, 2025 Case
11 Management Conference, subject to the Court's availability.

12 4. The above schedule will provide each Party reasonable and appropriate time to prepare
13 any submissions to the Court.

14 5. The Parties submit that this proposal is consistent with the timeline of this MDL, which
15 departs from the conventional timeline of the Federal Rules of Civil Procedure due to the complexity of
16 issues involved in this case.

17 6. The Parties agree that the relief sought herein will not prejudice either Party.

18 7. The Parties agree that the relief sought herein will not affect the schedule of this case.

19 8. Accordingly, under Local Rules 6-2 and 7-12, the Parties stipulate and respectfully
20 request that the Court authorize Meta to file an amended answer on or before January 15, 2025, and
21 order the Parties' agreed-upon briefing schedule set forth above, with any motion to strike to be heard on
22 March 21, 2025, subject to the Court's availability.

23 **IT IS SO STIPULATED AND AGREED.**

24 ///

DATED: December 13, 2024

Respectfully submitted,

ROB BONTA

Attorney General
State of California

/s/ Bernard Eskandari

Nicklas A. Akers (CA SBN 211222)
Senior Assistant Attorney General
Bernard Eskandari (SBN 244395)
Emily Kalanithi (SBN 256972)
Supervising Deputy Attorneys General
Nayha Arora (CA SBN 350467)
David Beglin (CA SBN 356401)
Megan O'Neill (CA SBN 343535)
Joshua Olszewski-Jubelirer (CA SBN 336428)
Marissa Roy (CA SBN 318773)
Brendan Ruddy (CA SBN 297896)
Deputy Attorneys General
California Department of Justice
Office of the Attorney General
455 Golden Gate Ave., Suite 11000
San Francisco, CA 94102-7004
Phone: (415) 510-4400
Fax: (415) 703-5480
Megan.ONeill@doj.ca.gov

*Attorneys for Plaintiff the People of the State of
California*

PHILIP J. WEISER

Attorney General
State of Colorado

/s/ Krista Batchelder

Krista Batchelder, CO Reg. No. 45066, *pro hac vice*
Senior Assistant Attorney General
Lauren M. Dickey, CO Reg. No. 45773, *pro hac vice*
First Assistant Attorney General
Megan Paris Rundlet, CO Reg. No. 27474
Senior Assistant Solicitor General
Elizabeth Orem, CO Reg. No. 58309
Assistant Attorney General
Colorado Department of Law
Ralph L. Carr Judicial Center
Consumer Protection Section

1 1300 Broadway, 9th Floor
2 Denver, CO 80203
3 Phone: (720) 508-6348
4 krista.batchelder@coag.gov

5 *Attorneys for Plaintiff State of Colorado, ex rel. Philip J.*
6 *Weiser, Attorney General*

7 **RUSSELL COLEMAN**
8 Attorney General
9 Commonwealth of Kentucky

10 /s/ Philip Heleringer

11 J. Christian Lewis (KY Bar No. 87109), *Pro hac vice*
12 Philip Heleringer (KY Bar No. 96748), *Pro hac vice*
13 Zachary Richards (KY Bar No. 99209), *Pro hac vice*
14 Daniel I. Keiser (KY Bar No. 100264), *Pro hac vice*
15 Matthew Cocanougher (KY Bar No. 94292), *Pro hac vice*
16 Assistant Attorneys General
17 1024 Capital Center Drive, Suite 200
18 Frankfort, KY 40601
19 CHRISTIAN.LEWIS@KY.GOV
20 PHILIP.HELERINGER@KY.GOV
21 ZACH.RICHARDS@KY.GOV
22 DANIEL.KEISER@KY.GOV
23 MATTHEW.COCANOUGH@KY.GOV
24 Phone: (502) 696-5300
25 Fax: (502) 564-2698

26 *Attorneys for Plaintiff the Commonwealth of Kentucky*

27 **MATTHEW J. PLATKIN**
28 Attorney General
State of New Jersey

/s/ Thomas Huynh

Kashif T. Chand (NJ Bar No. 016752008), *Pro hac vice*
Section Chief, Deputy Attorney General
Thomas Huynh (NJ Bar No. 200942017), *Pro hac vice*
Assistant Section Chief, Deputy Attorney General
Verna J. Pradaxay (NJ Bar No. 335822021), *Pro hac vice*
Mandy K. Wang (NJ Bar No. 373452021), *Pro hac vice*
Deputy Attorneys General
New Jersey Office of the Attorney General,
Division of Law

124 Halsey Street, 5th Floor
Newark, NJ 07101
Tel: (973) 648-2052
Kashif.Chand@law.njoag.gov
Thomas.Huynh@law.njoag.gov
Verna.Pradaxay@law.njoag.gov
Mandy.Wang@law.njoag.gov

*Attorneys for Plaintiff New Jersey Division of Consumer
Affairs*

COVINGTON & BURLING LLP

/s/ Ashley Simonsen

Ashley M. Simonsen, SBN 275203
COVINGTON & BURLING LLP
1999 Avenue of the Stars
Los Angeles, CA 90067
Telephone: (424) 332-4800
Facsimile: + 1 (424) 332-4749
Email: asimonsen@cov.com

Phyllis A. Jones, pro hac vice
Paul W. Schmidt, pro hac vice
COVINGTON & BURLING LLP
One City Center
850 Tenth Street, NW
Washington, DC 20001-4956
Telephone: + 1 (202) 662-6000
Facsimile: + 1 (202) 662-6291
Email: pajones@cov.com

*Attorney for Defendants Meta Platforms, Inc. f/k/a
Facebook, Inc.; Facebook Holdings, LLC; Facebook
Operations, LLC; Facebook Payments, Inc.; Facebook
Technologies, LLC; Instagram, LLC; Siculus, Inc.; and
Mark Elliot Zuckerberg*

SIGNATURE CERTIFICATION

Under Civ. L.R. 5-1(h)(3), I hereby attest that all signatories listed, and on whose behalf the filing is submitted, concur in this filing's content and have authorized this filing.

DATED: December 13, 2024

/s/ Bernard Eskandari

Bernard Eskandari

Attorney for the People of the State of California

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: December ____, 2024

YVONNE GONZALEZ ROGERS
UNITED STATES DISTRICT JUDGE